
THE BAILYN LAW FIRM, P.C.

Bradley R. Bailyn, Esq.

September 27, 2024

MEMO ENDORSED

The Application is granted.

SO ORDERED:



Paul G. Gardephe, U.S.D.J.

Date: September 30, 2024

VIA ECF

Hon. Paul G. Gardephe
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

*Re: Converged Compliance Solutions, Inc. v. XOP Networks, Inc.
et al., No. 21-CV-05482-PGG*

Dear Judge Gardephe:

This is a joint letter written on behalf of all four parties to this case respectfully requesting that the 14-day period to file written objections to Magistrate Judge Wang's 51-page Report and Recommendation issued on September 25, 2024 (Docket No. **54**), is extended to 30 days, so that instead of being due on October 9, 2024, Plaintiff's objections would be due on October 25, 2024. Similarly, we request that the Defendants' time to respond to any objections that Plaintiff might file would be due 30 days thereafter, on November 25, 2024.

The Report addresses numerous intricate issues, including breach of contract claims, trade secret misappropriation under both federal and state law, and various tort claims. The complexity of the Report necessitates a thorough review to determine whether any objections are warranted. The standard 14-day period provided under 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b) does not afford Plaintiff adequate time to perform the careful analysis required to assess the need for objections and to draft objections, if appropriate.

Additionally, the upcoming Jewish holidays, including Rosh Hashanah (October 2) and Yom Kippur (October 11), further constrain the Plaintiff's ability to conduct a comprehensive review. While other attorneys can assist if necessary, the attorney primarily responsible for drafting the original pleadings is best suited to evaluate the Court's detailed findings and formulate any potential objections.

Finally, as all parties consent, whatever potential for harm resulting from a brief extension of time there may be does not exceed the benefit of a proper, informed analysis. We appreciate the Court's understanding and its consideration of this request. Should the Court require additional information, we are available for a conference at the Court's convenience.

Respectfully submitted,

P: 646-326-9971
F: 347-391-2752

E: brad@bailynLaw.com
W: bailynlaw.com

THE BAILYN LAW FIRM, P.C.

Bradley R. Bailyn, Esq.

THE BAILYN LAW FIRM, P.C.

By: /s/ Bradley R. Bailyn

Bradley R. Bailyn

CC: All Counsel of Record, via ECF